

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANDREA BROOKER and JERMAL D. BROOKER,	X	
	:	
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 02-CV-2651
	:	
	:	
TEXTRON, INC. and TEXTRON, INC.	:	
a/k/a d/b/a TEXTRON LYCOMING and	:	
TEXTRON LYCOMING and AVCO	:	
CORPORATION,	:	
	:	
Defendants.	:	
	X	

**DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT FOR IMPROPER
VENUE OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendants Textron Inc., Textron Lycoming and Avco Corporation hereby move this Court to dismiss the Complaint for improper venue pursuant to Fed. R. Civ. P. 12(b)(3) or, in the alternative, to transfer venue to the Middle District of Pennsylvania pursuant to 28 U.S.C. § 1406(a).

The grounds for this Motion are set forth with particularity in the accompanying Memorandum in Support of Defendants' Instant Motion and the Affidavits of Dan P. Smith and Ann T. Willaman.

Dated: May 31, 2002

Respectfully submitted,

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Associate Counsel of Record
Pursuant to Local Rule 83.5.2

Attorneys for Defendants

CERTIFICATE OF SERVICE

This certifies that on this day, I served the foregoing **DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT FOR IMPROPER VENUE OR, IN THE ALTERNATIVE, TO TRANSFER VENUE** on Plaintiffs by forwarding copies to their attorney via first-class mail to:

Harry J. Sher, Esq.
1210 Atlantic Building
260 South Broad Street
Philadelphia, PA 19102

This 31st day of May, 2002.

Sarah B. McClure